

The rejection of claims 39-53 is respectfully traversed because *Choy et al.* does not disclose the limitations of claims 39-53. For example, independent claim 39, 43, 46, and 50 all recite a “dump file.” *Choy et al.* does not disclose a “dump file,” and the portions of *Choy et al.* cited in the Office Action do not relate to a “dump file.”

Specifically, *Choy et al.* is directed to a multi-tiered indexing method for partitioned data in distributed or parallel database systems. (Col. 4:62-65) A “Local Index is created and maintained for each partition of the table” and a Coarse Global Index, which “identifies the indexed partitions by partition identifiers (PIIDs)” is optionally created and maintained as well. (Col. 5:28-32) *Choy et al.* further describes a technique to address consistency between the Local Index entries and the Coarse Global Index entries during concurrent index accesses by different transactions by a locking protocol that handles the insertion and deletion of index entries.” (Col. 5:32-37) *Choy et al.* does not disclose the “dump file” of the claims, and exporting and importing data to and from a dump file as covered by the claims is unrelated to *Choy et al.*’s objective of providing index management.

The Office Action states on page 2, item 3 states that “*Choy* teaches a method of exporting data from a table into a dump file (thus, one or more partitions of a table may be stored in a single site, each partition of the table typically is associated with a group of physical storage device; which is equivalent to exporting from data from a table into a dump file) (see col. 2, lines 5-8).” However, a “dump file” does not read on a physical storage device, and such a reading would render other limitations of claims 39-42, 46-49, 54-55, and 57-58 nonsensical such as “not stored in the dump file.” Additionally, “being an equivalent” has no proper role in a rejection for anticipation under 35 U.S.C. § 102.

Further, independent claim 43 recites “**importing** the data contained in selected partitions into corresponding partitions of a second relational database table,” and independent claim 50

recites “**importing** the data contained in selected partitions into corresponding partitions of a second database object.” *Choy et al.* does not disclose “importing the data” as set forth in claims 43-45, 50-53, 56 and 59, nor the “exporting of data” of new claims 55 and 58. The mere disclosure of storing data, without more as in *Choy et al.*, however, is insufficient to amount to a teaching of “importing” or “exporting.”

Newly presented dependent claims 54, 56-57, and 59 recites “wherein the dump file includes statements in a data description language (DDL) describing how to recreate the data contained in said each of the selected partitions of the table,” which *Choy et al.* fails to disclose.

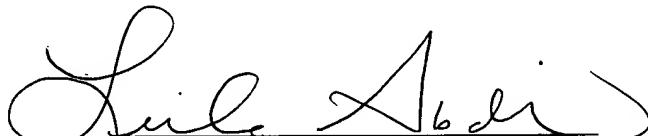
Dependent claims 40-42, 44-45, 47-49, and 51-59 are allowable for at least the same reasons as their independent claims and are separately patentable on their own merits.

Therefore, the present application, as amended, overcomes the objections and rejections of record and is in condition for allowance. Favorable consideration is respectfully requested. If any unresolved issues remain, it is respectfully requested that the Examiner telephone the undersigned attorney at 703-425-8501 so that such issues may be resolved as expeditiously as possible.

Respectfully Submitted,

DITTHAVONG & CARLSON, P.C.

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Date



Leila Abdi
Attorney/Agent for Applicant(s)
Reg. No. 52399

10507 Braddock Rd
Suite A
Fairfax, VA 22032
Tel. 703-425-8501
Fax. 703-425-8518

APPENDIX

54. (New) A method according to claim 39, wherein the dump file includes statements in a data description language (DDL) describing how to recreate the data contained in said each of the selected partitions of the table.

55. (New) A method according to claim 39, wherein the storing includes exporting the data contained in each of the selected partitions of the table into the dump file.

56. (New) A method according to claim 43, wherein the dump file includes statements in a data description language (DDL) describing how to recreate the data contained in said each of the selected partitions of the table.

57. (New) A method according to claim 46, wherein the dump file includes statements in a data description language (DDL) describing how to recreate the data contained in said each of the selected partitions of the table.

58. (New) A method according to claim 46, wherein the storing includes exporting the data contained in each of the selected partitions of the table into the dump file.

59. (New) A method according to claim 50, wherein the dump file includes statements in a data description language (DDL) describing how to recreate the data contained in said each of the selected partitions of the table.